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*Attorneys for Defendants Richard Spring
The Spring Family Trust, and The Jeanne T. Spring Trust*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

x

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,
Debtor.

SIPA LIQUIDATION

Case No. 08-01789 (SMB)

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IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 09-01305 (SMB)

Plaintiff,

v.

ALVIN J. DELAIRE, *et al.*,

Defendants.

x

DECLARATION OF DAVID B. TATGE, ESQ.

DAVID B. TATGE, declares, pursuant to § 1746 of title 28 of the United States Code as follows:

1. I am currently a member of David B. Tatge, PLLC in Oak Hill, VA (the “**Tatge Firm**”) and until close of business on May 1, 2018 had been a member of Epstein Becker & Green P.C. (the “**EBG Firm**”), in its Washington, D.C. office. I respectfully submit this declaration in support of the motion, pursuant to Local Bankruptcy Rule 2090-1(e), to authorize me and the EBG Firm to withdraw as special counsel of record for Richard Spring, The Spring Family Trust, and The Jeanne T. Spring Trust (the “**Spring Defendants**”) in the above captioned adversary proceedings.

2. The Spring Defendants continue to retain the law firm of Katsky Korins LLP, with offices located at 605 Third Avenue, New York, New York.

3. In the Spring of 2017, the Trustee scheduled a non-party deposition of a witness named Louis Glickfield (“**Glickfield**”), which Trustee proposed to take in the Washington, D.C. area. In connection with such non-party deposition, the Spring Defendants retained me at the EBG Firm to represent the Spring Defendants at the Glickfield deposition. In connection therewith by an Order of this Court dated June 5, 2017, I was admitted pro hac vice in this proceedings. At that time I was a partner at the EBG Firm.

4. As of the close of business on May 1, 2018 I left the EBG Firm and I am currently a member of the Tatge Firm.

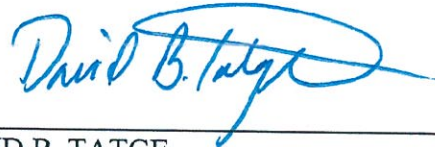
5. In connection with my move to the Tatge Firm and due to the fact that my services were limited to the Glickfield deposition, which has now been concluded, I have requested that both I and the EBG Firm withdraw as special counsel to the Spring Defendants in these adversary proceedings, and the Spring Defendants have consented to same.

6. Because the Spring Defendants will remain represented by Katsky Korins LLP, I respectfully submit there is no prejudice to the Spring Defendants or any party, in these proceedings.

7. In light of the foregoing, I respectfully request that the Court authorize me and the EBG Firm to withdraw as special counsel of record, and direct that the EBG Firm's and my appearance on the docket (in this adversary proceeding and in the main case) be removed from ECF service.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: Oak Hill, Virginia
May 31, 2018



DAVID B. TATGE